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10 Defendants

11 **HIDDEN EMPIRE HOLDINGS, LLC,**
12 **HYPER ENGINE, LLC, AND DEON**
13 **TAYLOR;**
14 And Third-Party Defendant
15 **ROXANNE TAYLOR**

16 **UNITED STATES DISTRICT COURT**
17 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**

18 **HIDDEN EMPIRE HOLDINGS,**
19 **LLC; a Delaware limited liability**
20 **company; HYPER ENGINE, LLC; a**
21 **California limited liability company;**
22 **DEON TAYLOR, an individual,**

23 Plaintiffs,
24 vs.

25 **DARRICK ANGELONE, an**
26 **individual; AONE CREATIVE LLC,**
27 **formerly known as AONEE**
28 **ENTERTAINMENT LLC, a Florida**
limited liability company; and ON
CHAIN INNOVATIONS LLC, a
Florida limited liability company,

Case No. 2:22-cv-06515-MWF-AGR

The Hon. Michael W. Fitzgerald

**DECLARATION OF ERIN BURKE IN
SUPPORT OF PLAINTIFFS' REPLY
BRIEF**

HEARING:

DATE: August 18, 2025

TIME: 10:00 a.m.

LOCATION: Courtroom 5A



1 Defendants.

2 DARRICK ANGELONE, an
3 individual; AONE CREATIVE LLC,
4 formerly known as AONE
5 ENTERTAINMENT LLC, a Florida
6 limited liability company; ON
7 CHAIN INNOVATIONS LLC, a
8 Florida limited liability company

9 Counterclaimants,

10 HIDDEN EMPIRE HOLDINGS,
11 LLC; a Delaware limited liability
12 company; HYPERENGINE, LLC; a
13 California limited liability company,
14 DEON TAYLOR, an individual,

15 Counterclaim
16 Defendants,

17 DARRICK ANGELONE, an
18 individual; AONE CREATIVE LLC,
19 formerly known as AONE
20 ENTERTAINMENT LLC, a Florida
21 limited liability company; ON
22 CHAIN INNOVATIONS LLC, a
23 Florida limited liability company,

24 Third-Party Plaintiffs

25 v.



1 ROXANNE TAYLOR, an
2 individual, Third-Party Defendant
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DECLARATION OF ERIN BURKE

I, Erin Burke, declare as follows:

1. I am over the age of 18 years and am an Owner-Member of Silent Stack Cybersecurity, LLC since April 2024. As an owner-member, I conduct forensic investigations and advise clients on cybersecurity best practices.

2. I have reviewed the Declaration of Rick Watts (“Watts Decl.”) and Mr. Watts’ Rebuttal Report.

3. In his Rebuttal Report, he states that he has reviewed all the files provided by Google and there is not an administrator log that indicates that Plaintiffs’ Google Workspace was deleted. Ex A to Watts Decl. at 15. While Mr. Watts is correct that the administrator log is the document I would expect to provide information about how the Workspace was deleted, Google has not produced the administrator log for HEFG’s Google Workspace account. Google only produced the login logs.

4. As an expert in this field, and with Mr. Watts’ purported familiarity with Google, he is well aware of, and able to distinguish among, the various log types that Google produces. The absence of reference to a *deletion* log event is not evidence that there was no deletion. Instead, the *user* account logs, which Google did produce, do not capture workspace account deletions or other administrator actions on the domain. If I had the administrator logs in my possession, I would not need to render an opinion on what happened, as the logs would be self-evident.

5. Mr. Watts also states that the user logs were only for the new HEFG Google Workspace created in October 2022.



1 6. I agree with Mr. Watts that the audit logs were only from the new
2 workspace (not snippets from the old), as that is the most likely scenario consistent
3 with Google’s “clean separation” operations. The reason for my exploring whether
4 these could be snippets from the prior account arose because Darrick’s mother’s
5 house IP was observed in those logs, and Darrick would have no reason, and as I
6 understand it from counsel, was prohibited by this court, from any involvement in
7 any new Google account creation for Hidden Empire.

8 7. However, considering Mr. Watts’ opinion that the logs were solely the
9 new workspace account, and again which I agree as the most likely scenario, means
10 that some computing device at Darrick’s mother’s house was logged into the *new*
11 Hidden Empire account on October 10, 2022 at 19:32:32, approximately one
12 minute before Roxanne Taylor received notification that a new account had been
13 set up (received 19:33:35). This remarkable coincidence in timing of a computer-
14 inside-Darrick’s-mothers-house being in the new Hidden Empire Google
15 Workspace account simultaneously to that new account’s creation (the logs show
16 the IP was also seen in the account at 19:33:36, one second after the creation
17 notification email to Roxanne) suggests *Darrick* created a new account for Hidden
18 Empire, not Google. Notably, this would be advantageous, because account
19 recovery becomes impossible when a new workspace account is created using the
20 same domain, as is explained in Google help documentation.
21 <https://support.google.com/a/answer/1397578?hl=en> (Google specifically notes
22 that recovery is **not possible** when: the user was deleted more than 20 days ago or
23 the domain is no longer available—or has been *moved to another Workspace*
24
25



1 *account*).

2 8. Simply put, a computing device at Darrick's mom's residence should
3 have had no interaction with the new Hidden Empire Google Workspace account.

4 9. Further, Mr. Watts' statement that "Mr Angelone was never in the
5 environment on October 10" is incorrect because the IP from his mother's house
6 (so if not Darrick, then someone with access to a computer inside his mother's
7 house) was in the new Hidden Empire account on that day according to the admin
8 audit logs, and the only way he could have been able to create the new workspace
9 account is if the prior workspace account was deleted—yet, *no one* knew it had
10 been deleted at that time, except apparently him.

11 10. If there was an email from Google to Darrick explaining Google
12 deleted the account, he did not produce it (it would seem helpful to him), and if he
13 did get that notification from Google and not produce it, it is unclear why then he
14 would take it upon himself to create a new account for Plaintiff, unless to ensure
15 impossibility of prior account recovery.

16 11. One can create a new Google workspace account using any gmail
17 address to receive ownership notification, and Darrick had knowledge of
18 Roxanne's personal gmail, which received the notification.

19 12. In Mr. Watts' paragraph 10, when referencing logs that show Darrick
20 did not log in again after getting privileges reinstated, again, it is technically
21 possible for a Google Workspace user—especially an administrator—to perform
22 actions after their last recorded login date in the audit logs, for several reasons. The
23 login audit log only records interactive login events—typically via browser or app.
24



1 It does not log all background token-based access, such as script-based access, API
2 calls, or Admin SDK automation.

3 13. As a result, the absence of a recent login event does not necessarily
4 mean the user did not perform a recent action. The Admin audit logs remain the
5 authoritative source for verifying whether the user account was used to perform the
6 action in question.

7 14. As a specific example, tools such as GAM (Google Apps Manager)
8 authenticate once via OAuth 2.0 and store access tokens locally. These tokens can
9 remain valid for extended periods, allowing administrative actions to be performed
10 via command line or scripts without requiring a fresh login. In such cases, no new
11 login event is triggered. However, actions (e.g., deletions) are still logged in the
12 Admin audit logs, which have not been produced.

13 15. Finally, Mr. Watts' opinion that the Google employee transcripts are
14 "unreliable" is contrary to both 1) the explicit statements that the deletion was
15 performed by the prior administrator, and which show no confusion by a language
16 barrier as he suggests, and 2) Google's own terms and conditions, which state that
17 Google will delete an account only under specific circumstances, such as breaching
18 terms of agreement, to comply with a legal order, or if the account is causing harm
19 or liability, none of which occurred here and would precipitate Google to perform
20 a deletion of customer information. See [https://policies.google.com/terms?hl=en-](https://policies.google.com/terms?hl=en-US)
21 [US](https://policies.google.com/terms?hl=en-US).
22

23 16. Google would not be a successful business platform if it took
24 unilateral action to delete customers' business operational accounts without good
25



1 cause. Google's ability to delete is a technical possibility, *not* a reasonable
2 explanation.

3
4
5 I declare under the penalty of perjury under the laws of the United States of
6 America that the foregoing is true and correct.

7 Executed on August 11, 2025 at Los Angeles, California

8
9 /s/ Erin Burke
10 Erin Burke
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